

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

CAIR FOUNDATION, INC., d/b/a  
COUNCIL ON AMERICAN-ISLAMIC  
RELATIONS, & CAIR,

Plaintiff,

v.

LORI SAROYA,

Defendant.

Civil No.: 0:21-cv-01267 (SRN/TNL)

**STATEMENT REGARDING  
CONFIDENTIALITY RELATING TO  
THE DECLARATION OF LORI  
SAROYA AND EXHIBITS A-B  
PURSUANT TO MINN. L.R.  
5.6(d)(1)(A)(ii)**

Defendant Lori Saroya (“Saroya”) submits the following Statement Regarding Confidentiality pursuant to Minn. L.R. 5.6(d)(1)(A)(ii). Saroya submits the Declaration of Lori Saroya in Support of Defendant’s Motion for Declaration that No Privilege Exists with Respect to a 2014 Report Provided by CAIR to Her, that Any Privilege Has Been Waived, or that She May Use the Report to Present Facts in the Report in Her Defense (“Saroya Declaration”), along with Exhibits A-B, under seal. Saroya does not believe that these documents are confidential or properly sealed. However, in order to give Plaintiff the opportunity to make whatever argument it wishes regarding the confidentiality of these documents, Saroya is filing them under temporary seal in the present filing. Under the circumstances, it would be impracticable to file the Saroya Declaration or Exhibits A-B in redacted form.

Dated: November 23, 2021

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